
**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	Case No.: 2:07-cr-219-MHT
)	
DARRELL GAMBLE)	

MOTION FOR EXTENSION OF TIME TO FILE BRIEF

COMES NOW the Defendant, **DARRELL GAMBLE**, by undersigned counsel, Donnie W. Bethel, and requests an extension of time to file his brief in support of his sentencing argument. In support of this motion undersigned counsel states:

1. The sentencing hearing in this matter began on May 21, 2008, and this Court continued the hearing on that date. On May 23, 2008, this Court set the sentencing hearing to continue on July 3, 2008. The Court's order established the following briefing schedule:

- a. Defendant's brief to be filed by June 6, 2008;
- b. Briefs by the Government and the Probation Office to be filed by June 20, 2008;
- c. Defendant's reply brief to be filed by June 27, 2008.

2. Undersigned Counsel will be out of the office for the next two weeks: the week of May 26, 2008, he will be in New Orleans for Advanced Federal Defender Training; the week of June 2, 2008, he will be in Georgia performing duty for the United States Air Force Reserve. He will not return to the office until Monday, June 9, 2008.

3. Therefore, Defendant requests that the Court allow him to file his initial brief by June 13, 2008.

4. The United States, through Assistant United States Attorney Verne Speirs, does not oppose this Motion.

WHEREFORE, for the reasons set forth above, Mr. Gamble moves this Court to grant his Motion.

Dated this 23rd day of May, 2008.

Respectfully submitted,

s/ Donnie W. Bethel
DONNIE W. BETHEL
Assistant Federal Defender
201 Monroe Street, Suite 407
Montgomery, Alabama 36104
Phone: (334) 834-2099
Fax: (334) 834-0353
E-mail: don_bethel@fd.org
IN Bar Code: 14773-49

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	Case No.: 2:07-cr-219-MHT
)	
DARRELL GAMBLE)	

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Verne H. Speirs, Assistant U. S. Attorney.

Respectfully submitted,

s/ Donnie W. Bethel
DONNIE W. BETHEL
Assistant Federal Defender
201 Monroe Street, Suite 407
Montgomery, Alabama 36104
Phone: (334) 834-2099
Fax: (334) 834-0353
E-mail: don_bethel@fd.org
IN Bar Code: 14773-49